

DAVID L. ANDERSON (CABN 149604)
United States Attorney

HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

SAILAJA M. PAIDIPATY (NYBN 5160007)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
sailaja.paidipaty@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No Cr 19-0381-2 CRB
)	
Plaintiff,)	
)	STIPULATION AND [PROPOSED] ORDER
v.)	REGARDING CONDITIONS OF PRETRIAL
)	RELEASE
KAROL ERAZO REANOS,)	
)	
Defendant.)	

As discussed on the record during the bond hearing on June 29, 2020, the parties submit this stipulation detailing the parameters of the stay away order imposed by the Court. The parties agree and stipulate that while on pretrial release, the defendant will stay away from the area in San Francisco bordered on the west by Polk Street and South Van Ness Avenue, on the north by Geary Street, on the east by Powell Street and 3rd Street, and on the south by Mission Street, with the following exceptions: 1) the defendant may enter the area to attend any court proceedings at 450 Golden Gate Avenue, or after requesting and receiving approval from her assigned U.S. Pretrial Services Officer; and 2) the defendant may travel on BART, MUNI, or other public transportation through the area, but may not then get off of

//

//

1 said transportation and enter the area on foot.

2 DATED: July 1, 2020

Respectfully submitted,

3
4 DAVID L. ANDERSON
United States Attorney

5 /s
6 SAILAJA M. PAIDIPATY
Assistant United States Attorney

7 DATED: July 1, 2020

8 /s (signed with permission)
9 MARK VERMEULEN
10 Counsel for Defendant

11
12 [PROPOSED] ORDER

13 Pursuant to the stipulation of the parties above and the statements on the record during the June
14 29, 2020 hearing, it is hereby ORDERED that the stay away condition imposed by the Court is modified
15 as set forth above detailing the boundaries of the area in San Francisco that the defendant must not enter
16 while on pretrial release.

17 DATE:

18 LAUREL BEELER
19 U.S. Magistrate Judge
20
21
22
23
24
25
26
27
28